

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
UNITED STATES OF AMERICA

v.

16 Cr. 521 (CM)  
**NOTICE OF MOTION**

ANDY GYAMFI,

Defendant.

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PLEASE TAKE NOTICE that upon the annexed declaration of counsel, memorandum of law, and all papers and prior proceedings had herein, defendant, Andy Gyamfi, will make a motion before the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, as soon as counsel may be heard, for Orders granting:

1. Suppression of cell-site location information obtained by the Government without a warrant supported by probable cause, in violation of the Fourth Amendment to the United States Constitution, as well as the fruits of that unlawful search and seizure;
2. Such further relief that this Court may deem just and proper.

Dated: August 10, 2018

Respectfully Submitted,

By:                     /s/                      
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cc     AUSA Hagan Scott  
       AUSA Jared Lenow